

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

TIARA ALEXANDER,)	
)	
Plaintiff,)	
)	
v.)	CAUSE NO:
)	
INDIANA UNIVERSITY HEALTH WEST HOSPITAL, INC.)	
)	
Defendant.)	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. NATURE OF THE CASE

1. Plaintiff, Tiara Alexander (“Alexander” or “Plaintiff”), by counsel, brings this action against Defendant, Indiana University Health West Hospital, Inc. (“Defendant” or “IU Health West Hospital”), alleging violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e, *et. seq.*

II. PARTIES

2. Alexander is a resident of Marion County in the State of Indiana, who at all times relevant to this litigation resided within the geographical boundaries of the Southern District of Indiana.

3. Defendant is a domestic corporation that maintains offices and conducts business in the Southern District of Indiana.

III. JURISDICTION AND VENUE

4. Jurisdiction is conferred on this Court over the subject matter of this litigation pursuant to 28 U.S.C. §1331; 28 U.S.C. §1343; and 42 U.S.C. § 2000e-5(f)(3).

5. Defendant is an “employer” as that term is defined by 42 U.S.C. § 2000e(b).

6. At all times relevant to this action, Alexander was an “employee” as that term is defined by 42 U.S.C. § 2000e(f)

7. Alexander exhausted her administrative remedies by timely filing a Charge of Discrimination against Defendant with the Equal Employment Opportunity Commission alleging discrimination based on her race. Alexander files this complaint within ninety (90) days of receipt of her Notice of Right to Sue.

8. A substantial part of the events, transactions, and occurrences concerning this lawsuit arose in the geographical environs of the Southern District of Indiana; therefore, venue is proper in this Court.

IV. FACTUAL ALLEGATIONS

9. Alexander was hired by Defendant on or about January 7, 2021 as a Team Lead in Environmental Services. She began orientation and training on January 25, 2021.

10. At all relevant times, Alexander met or exceeded Defendant’s legitimate performance expectations.

11. Alexander is a tall African American woman. During orientation and training, she was told that she intimidated others due to her race and size. Alexander was the only African American Team Lead in Environmental Services.

12. On January 29, 2021, Defendant had Alexander escorted out by police because she was intimidating.

13. Alexander was informed that Human Resources would follow up with her the next day; however, no one from IU Health West Hospital has followed up with her to date. Consequently, Alexander has been terminated from employment.

14. Similarly situated Team Leads have been treated more favorably than Alexander.

V. CAUSES OF ACTION

15. Alexander hereby incorporates by reference paragraphs one (1) through fourteen (14) of her complaint.

16. Defendant discriminated against Alexander based on her race.

17. Defendant's actions were intentional, willful and in reckless disregard of Alexander's rights as protected by Title VII of the Civil Rights Act of 1964.

18. Alexander has suffered and continues to suffer damages as a result of Defendant's unlawful actions.

VI. REQUESTED RELIEF

WHEREFORE, Plaintiff, Tiara Alexander, by counsel, respectfully requests that this Court enter judgment in her favor and award her the following relief:

1. Reinstatement of Alexander's employment to the position and salary she would have enjoyed but for Defendant's unlawful actions; and/or payment to Alexander of front pay in lieu thereof;

2. Permanently enjoin Defendant from engaging in any employment policy or practice that discriminates against any employee on the basis of his/her race;

3. Order that the Plaintiff be awarded any back pay she would have earned, including fringe benefits, with related monetary benefits and interest thereon, absent Defendant's unlawful acts;
4. Award the Plaintiff compensatory and consequential damages in an amount sufficient to compensate Plaintiff for the damages caused by the Defendant's unlawful actions;
5. Award the Plaintiff punitive damages for Defendant's violation of Title VII of the Civil Rights Act of 1964;
6. Award the Plaintiff her costs and attorney's fees incurred as a result of bringing this action;
7. Award the Plaintiff pre- and post-judgment interest on all sums recoverable; and
8. Grant all other legal and/or equitable relief as may be just and proper.

Respectfully submitted,

/s Andrew Dutkanych

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DEMAND FOR JURY TRIAL

The Plaintiff, Tiara Alexander, by counsel, respectfully requests a jury trial as to all issues deemed so triable.

Respectfully submitted,

/s Andrew Dutkanych

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